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April 23, 2012

Honorable Denis Hurley
United States District Court
100 Federal Plaza
Central Islip, NY 11722

RE: Lohan vs. Perez, et al., CV-11-5413 (DRH) (ARL)

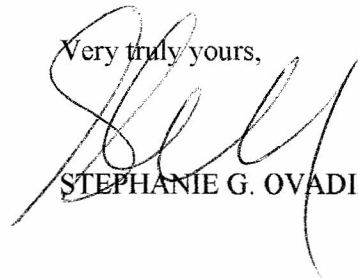
Dear Honorable Hurley:

Pursuant to your Individual Practice Rule 2E, we hereby respectfully request an extension of time to respond to the defendant's pre-motion conference letter which a response was to be made on April 23, 2012.

We have contacted defendant's counsel and have obtained their consent. We respectfully request the date to respond be on or about April 30, 2012. We have sought one prior adjournment.

If you have any questions, please do not hesitate to call. Thank you for your courtesy and cooperation to this matter.

Very truly yours,



STEPHANIE G. OVADIA, ESQ.

SGO:kc

cc: Anand Ahuja, Esq.
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